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12 Counsel to the Official Committee of Unsecured Creditors

13 **UNITED STATES BANKRUPTCY COURT**  
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 In re:

16 BORREGO COMMUNITY HEALTH  
17 FOUNDATION,

18 Debtor and Debtor in Possession.

Case No.: 22-02384-LT11

Chapter 11

**FIRST MONTHLY FEE  
APPLICATION OF FTI  
CONSULTING, INC., FINANCIAL  
ADVISOR TO THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS, FOR ALLOWANCE  
AND PAYMENT OF INTERIM  
COMPENSATION FOR THE  
PERIOD OCTOBER 7, 2022  
THROUGH OCTOBER 31, 2022**

CSD 1143 (04/28/96)

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

DEBTOR: Borrego Community Health Foundation

Petition Date: September 12, 2022

Case No. 22-02384

**MONTHLY FEE APPLICATION SUMMARY**

APPLICANT: FTI Consulting, Inc.

REPRESENTING: Official Committee of Unsecured Creditors

**ORDER APPROVING EMPLOYMENT:** Docket No. 242

<b>Task Code</b>	<b>Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
1	Current Operating Results & Events	10.7	\$8,025.00
2	Cash & Liquidity Analysis	12.1	9,075.00
6	Asset Sales	21.9	16,425.00
10	Analysis of Tax Issues	4.1	3,075.00
11	Prepare for and Attendance at Court Hearings	3.3	2,475.00
12	Analysis of SOFAs & SOALs	21.1	15,825.00
13	Analysis of Other Miscellaneous Motions	3.6	2,700.00
18	Potential Avoidance Actions & Litigation Matters	16.1	12,075.00
19	Case Management	4.5	3,375.00
20	General Meeting with Debtor & Debtors' Professionals	1.0	750.00
21	General Meetings with Committee & Committee Counsel	8.2	6,150.00
23	Firm Retention	5.9	4,425.00
26	Strategic Communications	89.8	67,350.00
<b>TOTAL</b>		<b>202.3</b>	<b>\$151,725.00</b>

1                                   **IN THE UNITED STATES BANKRUPTCY COURT**  
2                                   **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

3       In re:

4       BORREGO COMMUNITY HEALTH  
5       FOUNDATION,

6                                   Debtor and Debtor in Possession.  
7

) Chapter 11 Case

) Case No. 22-02384

) Judge: Hon. Laura S. Taylor  
8

9                                   **Monthly Fee Application**

10               FTI Consulting, Inc., together with its wholly owned subsidiaries (“FTI” or the  
11       “Firm”), submits its First Monthly Fee Application for Allowance and Payment of  
12       Interim Compensation and Reimbursement of Expenses (the “Application”) for the  
13       period October 7, 2022 – October 31, 2022 (the “Application Period”). In support of  
14       the Application, FTI respectfully represents as follows:

15               1.     FTI is the financial advisor to the Official Committee of Unsecured  
16       Creditors (the “Committee”). FTI hereby applies to the Court for allowance and  
17       payment of interim compensation for services rendered and reimbursement of  
18       expenses incurred during the Application Period.

19               2.     FTI billed a total of \$151,725.00 during the Application Period. The  
20       total fees represent 202.30 hours expended during the Application Period. These fees  
21       are broken down as follows:

22

<b>Application Period</b>	<b>Fees</b>	<b>Expenses</b>	<b>Total</b>
October 7, 2022 – October 31, 2022	\$151,725.00	\$0.00	\$151,725.00

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1           3.       Accordingly, FTI seeks allowance of interim compensation in the total  
2 amount of \$121,380.00 at this time, which represents 80% of fees totaling  
3 \$151,725.00 for services rendered. No expenses were incurred during the Application  
4 Period.

5           4.       As this is the Firm's First Monthly Fee Application, no amounts have  
6 been paid to the Firm to date.

7           5.       Attached as **Exhibit "A"** hereto is the name of each professional who  
8 performed services in connection with this case (the "Case") during the Application  
9 Period at the blended hourly rate approved for FTI for this Case. Attached hereto as  
10 **Exhibit "B"** is the detailed time and expense statements for the Application Period.

11           6.       The Firm has served a copy of this Application on the United States  
12 Trustee (the "U.S. Trustee"), the Debtor, counsel to the Debtor, counsel to the Patient  
13 Care Ombudsman, the United States of America, and the State of California, and  
14 parties requesting special notice (collectively, the "Notice Parties"). The Application  
15 was mailed by first class mail, postage prepaid, on or about January 3, 2023. Notice  
16 of the filing of this Application was served on the Notice Parties by first class mail,  
17 postage prepaid, on or about January 3, 2023.

18           7.       Pursuant to this Court's *Order on Debtor's Motion for Entry of an Order*  
19 *Establishing Procedures for Monthly Payment of Fees and Expense Reimbursement*  
20 (the "Interim Compensation Procedures Order") that was entered on or about  
21 December 15, 2022 [Docket No. 299], the Debtor is authorized to make the payment  
22 requested herein with a further hearing or order of this Court unless an objection to  
23 this Application is filed with the Court and served upon the Notice Parties within ten  
24 (10) calendar days after the date of mailing of the Notice of this Application. If such  
25 an objection is filed, the Debtor is authorized to pay 80% of the uncontested fees and  
26 100% of the uncontested expenses without further order of the Court. If no objection  
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1 is filed, the Debtor is authorized to pay 80% of all fees requested in the Application  
2 and 100% of the uncontested expenses without further order of the Court.

3 8. The interim compensation sought in this Application is not final. Upon  
4 the conclusion of this Case, the Firm will seek fees and reimbursement of expenses  
5 incurred for the totality of the services rendered in this Case. Any interim fees or  
6 reimbursement of expenses approved by this Court and received by the Firm will be  
7 credited against such final fees and expenses as may be allowed by this Court.

8 **WHEREFORE**, FTI respectfully requests that the Debtor pay compensation to  
9 the Firm as requested herein pursuant to an in accordance with the terms of the Interim  
10 Compensation Procedures Order.

11  
12 Dated: January 3, 2023

FTI CONSULTING, INC.

13  
14 By /s/ Cynthia Nelson

Cynthia Nelson

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Los Angeles, CA 90071

Telephone: 213-689-1200

E-mail: cynthia.nelson@fticonsulting.com

18 *Financial Advisors to the Official Committee*  
19 *of Unsecured Creditors of Borrego*  
*Community Health Foundation*

20 Submitted By:

21  
22 PACHULSKI STANG ZIEHL & JONES LLP

23 By /s/ Jeffrey N. Pomerantz

24 Jeffrey N. Pomerantz

25 Counsel to the Official Committee of  
26 Unsecured Creditors

# EXHIBIT A

# EXHIBIT A

## Summary Of Hours By Professional for Application Period (October 7, 2022 - October 31, 2022)

Professional	Position	Billing Rate	Total Hours	Total Fees
Bilbao, Marc	Senior Managing Director	\$750	2.5	\$ 1,875.00
Nelson, Cynthia A	Senior Managing Director	750	9.0	6,750.00
Zucker, Clifford	Senior Managing Director	750	24.5	18,375.00
Ganti, Narendra	Managing Director	750	15.2	11,400.00
Thalassinios, Angelo	Managing Director	750	25.8	19,350.00
Adeyanju, Michael	Senior Director	750	25.9	19,425.00
Delaney, Meaghan	Director	750	13.7	10,275.00
Gray, Michael	Senior Consultant	750	24.1	18,075.00
Labkoff, Nicole	Senior Consultant	750	6.3	4,725.00
Cho, Clare	Consultant	750	40.5	30,375.00
Hardey, Samantha	Consultant	750	13.7	10,275.00
Hellmund-Mora, Marili	Manager	750	1.1	825.00
<b>TOTAL</b>			<b>202.3</b>	<b>\$151,725.00</b>

# EXHIBIT B



**EXHIBIT B**  
**Detailed Time Statement for Application Period**  
**(October 7, 2022 To October 31, 2022)**

<b>Task Category</b>	<b>Date</b>	<b>Professional</b>	<b>Hours</b>	<b>Activity</b>
1	10/10/2022	Cho, Clare	1.8	Read through background articles and court filings re: engagement onboarding.
1	10/10/2022	Thalassinios, Angelo	0.4	Review findings re: the Debtor, regulatory status and related case filings.
1	10/11/2022	Cho, Clare	2.1	Review court docket and case background articles re: events leading to bankruptcy filing.
1	10/11/2022	Thalassinios, Angelo	0.4	Review research re: Debtor, regulatory status and related case filings.
1	10/12/2022	Zucker, Clifford	0.7	Review and analyze of community outreach program.
1	10/13/2022	Cho, Clare	0.7	Review the Debtor's leased property documents.
1	10/14/2022	Cho, Clare	0.7	Review documents related to Debtor's historical financial performance.
1	10/18/2022	Gray, Michael	1.0	Review case materials to understand key issues and events leading to bankruptcy.
1	10/24/2022	Cho, Clare	2.0	Research and review current status of various reports from and roles of regulatory parties in connection with the case.
1	10/24/2022	Gray, Michael	0.2	Review docket filings for potential disclosure of bar date.
1	10/26/2022	Zucker, Clifford	0.5	Review and analyze media outreach and monitoring.

1	1	10/26/2022	Gray, Michael	0.2	Review docket for latest updates.
2	<b>1 Total</b>				<b>10.7</b>
3	2	10/14/2022	Zucker, Clifford	0.7	Review and analyze liquidity forecast budget.
4	2	10/14/2022	Ganti, Narendra	0.4	Review cash flow and assumptions to assess liquidity uses for case.
5	2	10/18/2022	Gray, Michael	1.4	Prepare analysis and report on initial liquidity forecast provided by Ankura.
6	2	10/18/2022	Zucker, Clifford	0.8	Review and analyze Debtor's 13-week liquidity forecast.
7	2	10/18/2022	Cho, Clare	1.0	Prepare list of topics of discussion with Ankura about 13-week liquidity forecast.
8	2	10/18/2022	Gray, Michael	0.4	Review of liquidity forecast provided by Ankura.
9	2	10/18/2022	Ganti, Narendra	1.0	Participate in call with Ankura to discuss liquidity forecast and assumptions.
10	2	10/18/2022	Zucker, Clifford	1.0	Attend call with Ankura to discuss Debtor's cash flow budget.
11	2	10/18/2022	Cho, Clare	1.0	Participate in discussion with Ankura re: 13-week cash flow forecast.
12	2	10/19/2022	Gray, Michael	0.9	Update cash flow forecast report for inclusion of key assumptions used in liquidity analysis.
13	2	10/19/2022	Gray, Michael	0.8	Prepare summary of cash flow forecast for inclusion in report.
14	2	10/19/2022	Gray, Michael	0.7	Conduct public searches to understand ARPA grant funding, approved uses, and timeframe.
15	2	10/19/2022	Gray, Michael	0.4	Prepare summary of ARPA grant funding.
16	2	10/21/2022	Zucker, Clifford	0.4	Review and analyze DHCS receipts and correspondence.

1					Review materials in preparation of Committee call re: cash flow forecast.
2	2	10/24/2022	Gray, Michael	0.4	
3					Review first day declaration for disclosures re: use of ARPA funds.
4	2	10/26/2022	Gray, Michael	0.5	
5					Conduct public searches for disclosures re: use of ARPA funds.
6	2	10/26/2022	Gray, Michael	0.3	
7	<b>2 Total</b>			<b>12.1</b>	
8					
9	6	10/14/2022	Nelson, Cynthia A	0.3	Prepare agenda for meeting with Ankura re: sales process.
10					Participate in call with Debtor's financial advisor to discuss community outreach program and marketing of assets.
11	6	10/14/2022	Zucker, Clifford	0.7	
12					Participate in call with Ankura to discuss the case and status of sales efforts.
13	6	10/14/2022	Ganti, Narendra	0.7	
14					Participate in call with Debtors' advisors to discuss approach on public relations and status of sales efforts.
15	6	10/14/2022	Nelson, Cynthia A	0.7	
16					Confer with Pachulski regarding status of sale process and discussion with Debtor's counsel.
17	6	10/21/2022	Nelson, Cynthia A	0.3	
18					Participate in call with UCC Counsel re: sale process and discussion with Debtor's counsel.
19	6	10/21/2022	Zucker, Clifford	0.3	
20					Participate in call with Pachulski to discuss sale process.
21	6	10/21/2022	Ganti, Narendra	0.3	
22					Participate in follow up call with Pachulski re: sales process preparation and timing.
23	6	10/24/2022	Gray, Michael	0.3	
24					Participate in call with UCC counsel to discuss next steps with respect to obtaining additional information about status of Debtor's sales process preparation and timing.
25	6	10/24/2022	Nelson, Cynthia A	0.3	
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1	6	10/24/2022	Zucker, Clifford	0.3	Participate in call with Counsel on the status of the Debtor's sales process preparation and timing.
2	6	10/24/2022	Gray, Michael	0.2	Correspond with internal FTI team re: sale process.
3	6	10/25/2022	Ganti, Narendra	0.8	Discuss marketing process of asset sale with Ankura.
4	6	10/25/2022	Nelson, Cynthia A	0.8	Participate in call with Ankura re: sales process.
5	6	10/25/2022	Zucker, Clifford	0.8	Attend discussion with Ankura to discuss sale process.
6	6	10/25/2022	Ganti, Narendra	0.3	Participate in call with the FTI team member re: follow-up email to Pachulski about Borrego sales process.
7	6	10/25/2022	Nelson, Cynthia A	0.3	Discuss follow-up email correspondence with FTI team member re: Debtor's sales process.
8	6	10/27/2022	Gray, Michael	1.2	Review draft motion to approve sale and bid procedures.
9	6	10/27/2022	Ganti, Narendra	0.7	Review draft bid procedures motion to understand sale timeline.
10	6	10/27/2022	Zucker, Clifford	0.6	Review and analyze draft motion to approve sale and bid procedures.
11	6	10/27/2022	Zucker, Clifford	0.4	Provide comments to draft bid procedures motion.
12	6	10/27/2022	Nelson, Cynthia A	0.2	Prepare for call with UCC counsel re: sales process.
13	6	10/27/2022	Ganti, Narendra	0.8	Participate in call with Pachulski to discuss draft bid procedures motion and sale process.
14	6	10/27/2022	Nelson, Cynthia A	0.8	Discuss draft sales procedure motion with UCC counsel.

1	6	10/27/2022	Zucker, Clifford	0.8	Participate in call with Committee counsel on sale process and proposed bid procedures.
2					
3	6	10/27/2022	Nelson, Cynthia A	0.4	Participate in call with FTI team member to review open items with respect to sales process.
4					
5	6	10/27/2022	Zucker, Clifford	0.4	Participate in call with FTI team member on work plan re: sales process.
6					
7	6	10/28/2022	Gray, Michael	1.1	Review information provided by BRG re: sale process.
8					
9	6	10/28/2022	Zucker, Clifford	0.6	Review and analyze potential buyers list.
10					
11	6	10/28/2022	Zucker, Clifford	0.5	Review and analyze draft teaser.
12					
13	6	10/28/2022	Zucker, Clifford	0.5	Review and analyze sale process letter.
14					
15	6	10/31/2022	Ganti, Narendra	0.3	Participate in call with the UCC counsel to discuss interested party outreach and revisions to sales procedure motion.
16					
17	6	10/31/2022	Nelson, Cynthia A	0.3	Discuss Committee suggested revisions to sales procedure motion with Pachulski.
18					
19	6	10/31/2022	Zucker, Clifford	0.3	Participate in discussion with Pachulski on bidding procedure motion comments.
20					
21	6	10/31/2022	Ganti, Narendra	0.5	Participate in call with Pachulski to discuss status of sale process.
22					
23	6	10/31/2022	Bilbao, Marc	0.7	Participate in call with Ankura re: discussion on Debtor sales process.
24					
25	6	10/31/2022	Ganti, Narendra	0.7	Discuss sale process and marketing efforts with Ankura.
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6	10/31/2022	Nelson, Cynthia A	0.7	Participate in discussion with Ankura to provide comments on sales process materials.
6	10/31/2022	Zucker, Clifford	0.7	Participate in call with Ankura re: Debtor sale process and buyers.
6	10/31/2022	Bilbao, Marc	0.5	Review bid procedures to gain an understanding of the Debtor's proposal.
6	10/31/2022	Nelson, Cynthia A	0.8	Review bid procedures and marketing materials to obtain an understanding of Debtor's proposed bid procedures.
<b>6 Total</b>			<b>21.9</b>	
10	10/17/2022	Cho, Clare	1.9	Review and analyze top 5 contractors for the annual Form 990s.
10	10/19/2022	Zucker, Clifford	0.8	Review and analyze 2020 990 tax filing.
10	10/19/2022	Zucker, Clifford	0.7	Review and analyze 2018 990 tax filing.
10	10/19/2022	Zucker, Clifford	0.7	Review and analyze 2019 990 tax filing.
<b>10 Total</b>			<b>4.1</b>	
11	10/18/2022	Cho, Clare	0.9	Prepare list of topics of discussion re: the Section 341 meeting and about questions asked by the US Trustee.
11	10/18/2022	Cho, Clare	1.7	Attend 341 telephonic meeting of creditors re: financial status and debt obligations.
11	10/19/2022	Thalassinios, Angelo	0.1	Correspond with Pachulski via email re: hearing telephonic attendance, transcripts.

11	10/20/2022	Thalassinos, Angelo	0.6	Attend the October 20 telephonic bankruptcy court hearing re: automatic stay/TRO dispute and potential mediation.
<b>11 Total</b>			<b>3.3</b>	
12	10/18/2022	Ganti, Narendra	0.6	Review Schedules and Statements filed by Debtor.
12	10/18/2022	Gray, Michael	0.3	Review Schedules and Statements as filed to docket.
12	10/19/2022	Gray, Michael	1.1	Prepare report on Debtor Statements and Schedules with intention to present to Committee.
12	10/19/2022	Gray, Michael	0.8	Review and prepare analysis on Debtor Statements.
12	10/19/2022	Gray, Michael	0.7	Review and prepare analysis on Debtor Schedules.
12	10/19/2022	Cho, Clare	0.9	Update Statement and Schedules UCC report based on employment roster.
12	10/20/2022	Cho, Clare	2.5	Review RICO lawsuit to understand potential inclusions in the Schedules and Statements.
12	10/20/2022	Gray, Michael	1.1	Review lawsuit associated with RICO charge for inclusion in SOFA/SOAL report.
12	10/20/2022	Gray, Michael	0.9	Perform QC review of SOFA/SOAL report before distributing to internal FTI team.
12	10/20/2022	Cho, Clare	1.0	Update Schedules analysis based on contract dentists in the RICO lawsuit.
12	10/20/2022	Gray, Michael	0.5	Prepare summary of contract dentist claims re: SOFA for inclusion in report.



1					Process updates to UCC
2	12	10/21/2022	Cho, Clare	1.9	SOFA/SOAL report at the request of FTI team member.
3					
4	12	10/21/2022	Gray, Michael	1.2	Review and update SOFA/SOAL report for FTI team comments.
5					
6	12	10/21/2022	Ganti, Narendra	0.4	Review updates on SOFA and SOAL analysis.
7					
8	12	10/21/2022	Cho, Clare	1.2	Add top contractor compensations to SOFA/SOAL UCC report based on 990 filings.
9					
10	12	10/21/2022	Cho, Clare	0.5	Participate in call with the FTI team about UCC Presentation draft re: SOFA/SOAL Committee report.
11					
12	12	10/21/2022	Gray, Michael	0.5	Participate in regroup discussion with FTI team re: SOFA/SOAL Committee report.
13					
14	12	10/21/2022	Ganti, Narendra	0.5	Participate in internal call with the FTI team re: SOFA/SOAL Committee report.
15					
16	12	10/21/2022	Zucker, Clifford	0.5	Participate in call with FTI team on cash flow, government monies, and SOFA/SOAL Committee report.
17					
18	12	10/21/2022	Gray, Michael	0.2	Correspond with Ankura re: SOFA/SOALs.
19					
20	12	10/23/2022	Zucker, Clifford	0.6	Review and comment on draft report to the Committee re: SOFA/SOAL.
21					
22	12	10/23/2022	Ganti, Narendra	0.3	Review and revise presentation to Committee on SOFA/SOAL.
23					
24	12	10/23/2022	Gray, Michael	0.3	Update SOFA/SOAL report for FTI team comments.
25					
26	12	10/24/2022	Gray, Michael	0.4	Participate in call with FTI team member to discuss SOFA/SOAL analysis and report in advance of Committee call.
27					
28					



12	10/24/2022	Zucker, Clifford	0.4	Participate in call with FTI team on UCC report talking points and SOFA/SOAL analysis.
12	10/25/2022	Gray, Michael	0.4	Review and update diligence request list on outstanding SOFA/SOAL.
12	10/26/2022	Gray, Michael	0.6	Review SOFA and SOAL supporting schedules in preparation of follow-up diligence questions.
12	10/26/2022	Gray, Michael	0.4	Update information request list for supplemental questions re: SOFA/SOAL.
12	10/26/2022	Gray, Michael	0.2	Correspond with Pachulski re: SOFA/SOAL diligence questions.
12	10/26/2022	Gray, Michael	0.2	Correspond with Ankura re: SOFA/SOAL diligence questions.
<b>12 Total</b>			<b>21.1</b>	
13	10/10/2022	Zucker, Clifford	0.8	Review and analyze Lee declaration first day motions.
13	10/10/2022	Zucker, Clifford	0.9	Review and analyze cash management motion.
13	10/10/2022	Zucker, Clifford	0.8	Review and analyze Lee declarations on insider compensation.
13	10/13/2022	Zucker, Clifford	0.6	Review and analyze employee wage motion.
13	10/17/2022	Zucker, Clifford	0.5	Review and analyze of pleadings memo on key issues re: omnibus motions.
<b>13 Total</b>			<b>3.6</b>	
18	10/13/2022	Zucker, Clifford	0.8	Review and analyze advisory complaint agreement DHCS.

1	18	10/17/2022	Cho, Clare	2.4	Review DHCS dispute and RICO lawsuit documents.
2					
3	18	10/24/2022	Cho, Clare	2.8	Begin to prepare draft RICO lawsuit parties summary with information on key lawsuit parties.
4					
5	18	10/24/2022	Cho, Clare	2.7	Review RICO lawsuit filing to identify key lawsuit parties.
6					
7	18	10/25/2022	Cho, Clare	2.8	Continue to prepare RICO lawsuit parties schedule on reasons parties were included in lawsuit.
8					
9	18	10/25/2022	Cho, Clare	2.2	Process updates to working draft of RICO lawsuit parties' summary.
10					
11	18	10/25/2022	Gray, Michael	0.6	Review and comment on RICO lawsuit parties of interest summary.
12					
13	18	10/26/2022	Cho, Clare	1.8	Review and update RICO lawsuit parties' summary for FTI team member comments.
14					
15	<b>18 Total</b>			<b>16.1</b>	
16					
17	19	10/7/2022	Bilbao, Marc	0.3	Participate in call with FTI team member re: diligence requests.
18					
19	19	10/7/2022	Zucker, Clifford	0.3	Discuss diligence requests with FTI team member.
20					
21	19	10/12/2022	Zucker, Clifford	0.3	Review and analyze draft diligence request list.
22					
23	19	10/13/2022	Cho, Clare	0.8	Review data room materials and informational request list.
24					
25	19	10/13/2022	Cho, Clare	0.5	Review and prepare data room for new document production.
26					
27					
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19	10/18/2022	Ganti, Narendra	0.8	Participate in call with FTI team member re: case onboarding and workstreams.
19	10/18/2022	Gray, Michael	0.8	Participate in call with FTI team member to discuss case onboarding and workstreams.
19	10/24/2022	Gray, Michael	0.7	Prepare diligence request list for Ankura on outstanding workstreams.
<b>19 Total</b>			<b>4.5</b>	
20	10/11/2022	Ganti, Narendra	0.5	Participate in call with Ankura to discuss background of case.
20	10/11/2022	Zucker, Clifford	0.5	Attend discussion with Ankura to debrief on key case issues.
<b>20 Total</b>			<b>1.0</b>	
21	10/11/2022	Zucker, Clifford	0.5	Discuss work plan and case issues with Pachulski.
21	10/11/2022	Ganti, Narendra	0.5	Attend call with Pachulski to discuss information flow.
21	10/17/2022	Bilbao, Marc	1.0	Attend Committee call re: updates on sales process and liquidity.
21	10/17/2022	Ganti, Narendra	1.0	Participate in call with Pachulski and Committee to discuss sale process, cash flow, DHCS, and other case issues.
21	10/17/2022	Zucker, Clifford	1.0	Participate in Committee call to discuss financial and legal updates.
21	10/20/2022	Ganti, Narendra	0.6	Participate in call with Committee member to discuss legacy issues with Borrego.

21	10/24/2022	Gray, Michael	1.2	Participate in discussion with Committee re: case updates, SOFA/SOAL, and cash forecast.
21	10/24/2022	Nelson, Cynthia A	1.2	Participate in weekly UCC call to discuss case status, cash flow projection and sales process.
21	10/24/2022	Zucker, Clifford	1.2	Participate in Committee call to discuss financial and legal updates.
<b>21 Total</b>			<b>8.2</b>	
23	10/13/2022	Cho, Clare	2.4	Process updates to retention documents at the request of FTI team member.
23	10/18/2022	Hellmund-Mora, Marili	1.1	Prepare the retention declaration exhibits.
23	10/19/2022	Nelson, Cynthia A	1.0	Review employment application and retention declaration.
23	10/20/2022	Ganti, Narendra	0.5	Review and revise retention documents.
23	10/20/2022	Thalassinios, Angelo	0.1	Review scope of strategic communication workstream re: retention application.
23	10/26/2022	Nelson, Cynthia A	0.3	Review and finalize declaration and retention papers.
23	10/27/2022	Zucker, Clifford	0.5	Review comments to professional retention terms and summaries.
<b>23 Total</b>			<b>5.9</b>	
26	10/10/2022	Thalassinios, Angelo	0.4	Review Committee communications strategy and public affairs considerations.

1					Search for relevant news about Borrego Health for media clips to be shared with FTI strategic communications team and Pachulski.
2	26	10/10/2022	Hardey, Samantha	2.8	
3					
4					Research and outline potential public affairs and strategic communications strategy.
5	26	10/10/2022	Adeyanju, Michael	2.5	
6					
7	26	10/10/2022	Thalassinios, Angelo	1.6	Develop Committee communications strategy and related considerations.
8					
9					Participate in call with FTI team on media and government issues and communication strategy.
10	26	10/10/2022	Zucker, Clifford	0.3	
11					
12	26	10/10/2022	Adeyanju, Michael	0.3	Participate in meeting with the FTI team re: workstreams, communications strategy, and case update.
13					
14					Attend FTI team discussion re: strategic communications project scope.
15	26	10/10/2022	Cho, Clare	0.3	
16					
17	26	10/10/2022	Ganti, Narendra	0.3	Discuss potential public relations work stream with FTI team.
18					
19	26	10/11/2022	Delaney, Meaghan	2.9	Develop communications memorandum for consideration and review.
20					
21	26	10/11/2022	Adeyanju, Michael	2.6	Draft proposal memo for the UCC regarding strategic communications strategy to be offered.
22					
23	26	10/11/2022	Delaney, Meaghan	2.5	Prepare proposed timeline of strategic communications activity.
24					
25	26	10/11/2022	Hardey, Samantha	2.2	Search for relevant news about Borrego Health for media clips to be shared with FTI team and UCC counsel re: communication strategy.
26					
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26	10/11/2022	Thalassinos, Angelo	1.7	Draft public affairs strategy and related considerations.
26	10/11/2022	Adeyanju, Michael	2.0	Review and update proposal memo for the UCC regarding strategic communications strategy to be offered.
26	10/11/2022	Adeyanju, Michael	1.4	Draft and prepare strategic communications strategy to be offered in the proposal.
26	10/11/2022	Delaney, Meaghan	0.5	Develop media monitor to analyze external landscape.
26	10/11/2022	Adeyanju, Michael	0.5	Participate in discussion with FTI colleagues via email and Microsoft Teams re: conveying thoughts in the draft proposal.
26	10/11/2022	Adeyanju, Michael	0.3	Evaluate and analyze potential government affairs strategy.
26	10/12/2022	Thalassinos, Angelo	1.0	Develop and draft Committee communications, public affairs strategy and related considerations.
26	10/12/2022	Adeyanju, Michael	1.0	Revise and finalize proposal memo regarding strategic communications strategy to be offered.
26	10/12/2022	Delaney, Meaghan	0.3	Revise communication material before finalizing with the team.
26	10/12/2022	Adeyanju, Michael	0.1	Respond to internal FTI email about next steps in the proposal process.
26	10/12/2022	Delaney, Meaghan	2.6	Collaborate with FTI team member via Microsoft Teams to review, revise and finalize the proposal.

26	10/12/2022	Adeyanju, Michael	2.6	Participate in discussion with the FTI team member in order to review, edit and finalize the draft proposal.
26	10/12/2022	Ganti, Narendra	0.4	Participate in call with FTI team re: Committee communications, public affairs strategy and related considerations.
26	10/12/2022	Thalassinos, Angelo	0.4	Participate in call with FTI team to discuss Committee communications, public affairs strategy and related considerations.
26	10/14/2022	Thalassinos, Angelo	0.1	Debrief with FTI team member in advance of Committee call re: strategic communications workstreams.
26	10/14/2022	Adeyanju, Michael	0.1	Discuss draft proposal with the FTI team member prior to Committee call.
26	10/18/2022	Thalassinos, Angelo	0.8	Review and comment re: Committee counsel letter to California AG.
26	10/18/2022	Nelson, Cynthia A	0.3	Review and analyze draft of Borrego letter to DHCS.
26	10/18/2022	Thalassinos, Angelo	0.1	Prepare for call with Debtor, Committee professionals re: strategic communications.
26	10/19/2022	Thalassinos, Angelo	0.1	Correspond with FTI team via email re: strategic communications scope of work.
26	10/19/2022	Adeyanju, Michael	0.9	Participate in call with FTI team member re: overall strategy moving forward and next steps.
26	10/19/2022	Ganti, Narendra	0.9	Participate in call with FTI team member to discuss strategic communication issues.

1	26	10/19/2022	Thalassinos, Angelo	1.2	Develop and prepare strategic communications workstreams and related updates.
2					
3	26	10/19/2022	Adeyanju, Michael	1.0	Review and provide feedback on draft of Committee letter to California Deputy AG as well as offer strategic opinions for considerations.
4					
5	26	10/19/2022	Gray, Michael	0.4	Review draft of letter to DHCS and related FTI Strategic Communications correspondence.
6					
7	26	10/19/2022	Thalassinos, Angelo	0.4	Review draft of Committee letter to California AG.
8					
9	26	10/19/2022	Adeyanju, Michael	0.3	Participate in internal strategy session prior to UCC call.
10					
11	26	10/19/2022	Gray, Michael	0.3	Participate in internal discussion in advance of call with Jarrard re: communication strategy.
12					
13	26	10/19/2022	Adeyanju, Michael	0.6	Participate in call with FTI team and Pachulski to discuss strategic communications and a letter to the California Deputy AG.
14					
15	26	10/19/2022	Ganti, Narendra	0.6	Participate in call with Pachulski and Ankura to discuss strategic communications.
16					
17	26	10/19/2022	Thalassinos, Angelo	0.6	Participate in call with Pachulski re: strategic communications.
18					
19	26	10/19/2022	Adeyanju, Michael	0.3	Review agenda for call with Pachulski and develop agenda for Thursday's call with Jarrard.
20					
21	26	10/19/2022	Adeyanju, Michael	0.3	Participate and offer strategic counsel on FTI call with Debtor and Committee professionals.
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1					Participate in call with Jarrard to discuss strategic communications.
2	26	10/19/2022	Ganti, Narendra	0.3	
3					Prepare for strategic communications call with Debtor and Committee professionals.
4	26	10/19/2022	Thalassinios, Angelo	0.2	
5					Participate in discussion with Jarrard re: strategy communications.
6	26	10/19/2022	Gray, Michael	0.3	
7					Participate in internal debrief call after the call with Steve regarding next steps.
8	26	10/19/2022	Adeyanju, Michael	0.2	
9					Participate in internal debrief call after the call with Steve regarding next steps.
10	26	10/19/2022	Thalassinios, Angelo	0.2	
11					Participate in call with Debtor and Committee professionals re: strategic communications.
12	26	10/19/2022	Thalassinios, Angelo	0.6	
13					Review comments re: DHCS correspondence.
14	26	10/20/2022	Zucker, Clifford	0.3	
15					Draft cover sheet to accompany letter to California Deputy AG as well as provide media and public affairs considerations at play.
16	26	10/20/2022	Adeyanju, Michael	1.6	
17					Review and comment on draft Committee letter to California AG and develop related strategic considerations.
18	26	10/20/2022	Thalassinios, Angelo	0.9	
19					Review memo from Committee to DHCS and provide edits.
20	26	10/20/2022	Ganti, Narendra	0.5	
21					Review and develop strategic communications considerations.
22	26	10/20/2022	Thalassinios, Angelo	0.8	
23					Review and provide additional insights and revisions on draft Committee letter to California Deputy AG.
24	26	10/20/2022	Adeyanju, Michael	0.6	
25					
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26	10/20/2022	Adeyanju, Michael	0.2	Review and provide feedback on communications tool kit.
26	10/20/2022	Adeyanju, Michael	0.1	Create contact card to send over to Pachulski.
26	10/21/2022	Delaney, Meaghan	1.1	Conduct external media research to form media list.
26	10/21/2022	Thalassinios, Angelo	0.8	Review and edit draft Committee letter to Deputy AG.
26	10/21/2022	Hardey, Samantha	0.7	Compile media list for outreach to traditional news media.
26	10/21/2022	Thalassinios, Angelo	0.6	Review and edit media cover sheet re: Committee, goals.
26	10/21/2022	Thalassinios, Angelo	0.4	Develop strategic communications framework and review related considerations.
26	10/21/2022	Thalassinios, Angelo	1.2	Participate in call with FTI team re: cover sheet and facilitating the development of a media list to help with distribution of coversheet and letter to the California Deputy AG.
26	10/21/2022	Thalassinios, Angelo	0.2	Review key media outlets and reporters re: Borrego Health.
26	10/21/2022	Adeyanju, Michael	1.2	Participate in call with FTI team re: cover sheet and development of a media list to help with distribution of coversheet and letter to the California Deputy AG.
26	10/21/2022	Adeyanju, Michael	0.7	Participate in call with FTI team and Jarrard on public affairs, strategic communications, and media relations strategy.

26	10/21/2022	Thalassinos, Angelo	0.7	Participate in call with Jarrard firm re: strategic communications considerations, public affairs, and media relations strategy.
26	10/21/2022	Thalassinos, Angelo	0.7	Participate in call with PCO and Pachulski re: patient care, clinics assessment and related considerations.
26	10/23/2022	Thalassinos, Angelo	0.1	Correspond with Pachulski via email re: Deputy AG letter and related considerations.
26	10/23/2022	Thalassinos, Angelo	0.2	Review workstreams including messaging, engagement, diligence.
26	10/24/2022	Delaney, Meaghan	1.2	Identify relevant media targets for strategic communication outreach.
26	10/24/2022	Hardey, Samantha	1.3	Research and review relevant news about Borrego Health for media clips to be shared with team and counsel.
26	10/24/2022	Thalassinos, Angelo	0.7	Develop engagement strategy re: letter to Deputy AG including cover sheet and related considerations.
26	10/24/2022	Adeyanju, Michael	0.8	Review and provide feedback on media cover letter, media lists and media clips deliverables.
26	10/24/2022	Thalassinos, Angelo	0.7	Debrief and develop communications workplan.
26	10/24/2022	Labkoff, Nicole	0.6	Prepare draft of pitch for AG letter media outreach.
26	10/24/2022	Labkoff, Nicole	0.4	Review case materials re: case onboarding.
26	10/24/2022	Delaney, Meaghan	0.3	Prepare strategy of collaborative direction for next steps.

1	26	10/24/2022	Thalassinos, Angelo	0.3	Correspond with Pachulski via email re: strategic communications considerations and related research.
2	26	10/24/2022	Adeyanju, Michael	0.4	Review and revise media pitch.
3	26	10/24/2022	Hardey, Samantha	0.4	Compile media list for outreach to traditional news media.
4	26	10/24/2022	Thalassinos, Angelo	0.4	Review media research and related articles.
5	26	10/24/2022	Thalassinos, Angelo	0.3	Review Committee monitor.
6	26	10/24/2022	Adeyanju, Michael	0.6	Participate in internal FTI team meeting to debrief and strategize on next steps and needed deliverables.
7	26	10/24/2022	Thalassinos, Angelo	0.6	Discuss communications strategy with internal FTI team.
8	26	10/24/2022	Delaney, Meaghan	0.6	Attend internal FTI team meeting re: communications strategy and key messaging.
9	26	10/24/2022	Hardey, Samantha	0.6	Participate in internal FTI team meeting to discuss updates and communications strategy.
10	26	10/24/2022	Adeyanju, Michael	0.5	Participate in call with the FTI team member re: communications project scope and strategy.
11	26	10/24/2022	Labkoff, Nicole	0.5	Attend meeting with FTI team member to onboard to materials.
12	26	10/25/2022	Delaney, Meaghan	1.0	Revise existing communications approach for Counsel and the Committee.
13	26	10/25/2022	Thalassinos, Angelo	0.8	Implement engagement strategy and provide related updates re: Committee letter to Deputy AG.

1					Research and review relevant news about Borrego Health for media clips to be shared with team and counsel.
2	26	10/25/2022	Hardey, Samantha	0.8	
3					
4	26	10/25/2022	Adeyanju, Michael	0.5	Review and revise updated proposal.
5					
6	26	10/25/2022	Thalassinos, Angelo	0.3	Review and circulate media monitor to Pachulski.
7					
8	26	10/26/2022	Zucker, Clifford	0.5	Review and analyze DHCS letter for key messaging.
9					
10	26	10/26/2022	Delaney, Meaghan	0.7	Review and revise proposed changes to communications approach.
11					
12	26	10/26/2022	Adeyanju, Michael	0.3	Provide additional round of edits to the updated proposal memo.
13					
14	26	10/26/2022	Thalassinos, Angelo	0.3	Review engagement re: Deputy AG letter and related considerations.
15					
16	26	10/26/2022	Thalassinos, Angelo	0.2	Coordinate with Jarrard team re: engagement scope.
17					
18	26	10/26/2022	Thalassinos, Angelo	0.1	Review latest iteration of FTI communications workplan.
19					
20	26	10/26/2022	Thalassinos, Angelo	0.1	Review media activity on Debtor.
21					
22	26	10/27/2022	Thalassinos, Angelo	1.1	Review and edit workplan and related strategies and tactics.
23					
24	26	10/27/2022	Labkoff, Nicole	0.7	Identify messages for media from bankruptcy filings.
25					
26					Strategize regarding elected official due diligence in order to review and finalize edits to the updated proposal memo.
27	26	10/27/2022	Adeyanju, Michael	0.4	
28					

26	10/27/2022	Thalassinos, Angelo	0.4	Review court order and findings re: automatic stay and develop related engagement strategy.
26	10/27/2022	Hardey, Samantha	0.2	Update media list for outreach to traditional news media.
26	10/28/2022	Hardey, Samantha	1.4	Draft communications playbook including key messages for stakeholder groups.
26	10/28/2022	Labkoff, Nicole	1.3	Conduct stakeholder outreach.
26	10/28/2022	Thalassinos, Angelo	1.1	Review court order and findings re: automatic stay and implement engagement strategy.
26	10/28/2022	Adeyanju, Michael	0.5	Review and provide feedback on filing and messaging document.
26	10/28/2022	Hardey, Samantha	0.4	Review court order and findings to inform key communications messaging.
26	10/28/2022	Labkoff, Nicole	0.2	Conduct public searches to understand recent media activity on the Debtor.
26	10/28/2022	Hardey, Samantha	0.1	Update media list for outreach to traditional news media.
26	10/28/2022	Thalassinos, Angelo	0.1	Monitor recent media activity with respect to the Debtor.
26	10/28/2022	Thalassinos, Angelo	0.1	Review workplan and related strategies and tactics.
26	10/28/2022	Labkoff, Nicole	0.3	Participate in call with the FTI team to strategize on elected officials stakeholder mapping exercise.

26	10/28/2022	Adeyanju, Michael	0.3	Participate in call with the FTI team to strategize on elected officials stakeholder mapping exercise.
26	10/31/2022	Hardey, Samantha	2.8	Prepare draft of communications playbook including key messages for stakeholder groups.
26	10/31/2022	Labkoff, Nicole	2.0	Prepare draft of media Q&A for internal FTI team.
26	10/31/2022	Thalassinis, Angelo	0.6	Review communications workstreams.
26	10/31/2022	Labkoff, Nicole	0.3	Prepare analysis on policymaker mapping.
26	10/31/2022	Nelson, Cynthia A	0.3	Review and obtain understanding of FTI tasks with respect to strategic communications.
26	10/31/2022	Adeyanju, Michael	0.2	Review communications playbook deliverable.
<b>26 Total</b>			<b>89.8</b>	
<b>Grand Total</b>			<b>202.3</b>	